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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JUSTIN ORNELAS, JAZMIN ORENELAS and  
J.O., Jr., a minor by and through his Guardian Ad  
Litem, JUSTIN ORNELAS,

Plaintiffs,

v.

AMAZON.COM, INC., a foreign corporation;  
VOKHIDZMON ABDUKARIMOV, an  
individual; OXOS LLC, a foreign corporation;  
BXT, INC., an Illinois corporation; and DOES I  
through 20, inclusive.

Defendants.

ROGER LARGAESPADA, individually; JOSE  
ORLANDO LARGAESPADA, individually  
IRENE LARGAESPADA, individually;  
GLORIA RUTH LARGAESPADA, individually,

Plaintiffs,

v.

VOKHIDZMON ABDUKARIMOV, an  
individual; OXOS LLC, a foreign corporation;  
INKAS, LLC, a foreign corporation; BXT, INC.,  
an Illinois corporation; DOES I through 20; and  
ROE CORPORATIONS 1 through 20, inclusive,

Defendants.

CASE NO.: 2:22-cv-00304-JCM-DJA

**STIPULATION TO EXTEND  
DISCOVERY AND OTHER DEADLINES**

**(OXOS, LLC'S FIRST REQUEST,  
SECOND OVERALL REQUEST)**

Consolidated with:

CASE NO.: 2:23-cv-00609-GMN-VCF

1 AMAZON.COM, INC., a foreign corporation,

2  
3 Third-party Plaintiff,

4 v.

5 INKAS, LLC, a foreign corporation, DOES I  
6 through X, ROE BUSINESS ENTITIES 1  
7 through 10, inclusive,

8 Third-party Defendants.  
9

10 Defendant OXOS, LLC, (“Defendant Oxos”), by and through its attorneys of record,  
11 RANDALL TINDALL and MATTHEW B. BECKSTEAD, of the law firm Resnick & Louis, P.C.,  
12 and the other parties to this action, namely Plaintiffs JUSTIN ORNELAS, JAZMIN ORNELAS,  
13 and JUSTIN ORNELAS as Guardian Ad Litem for minor child J.O., JR., by and through their  
14 attorneys of record, ROBERT J. STOLL, JR., ROBERT J. STOLL, III, and BAGRIEL A.  
15 SINISCAL, of the law firm STOLL, NUSSBAUM & POLAKOV; Plaintiffs ROGER  
16 LARGAESPADA, ORLANDO LARGAESPADA, IRENE LARGAESPADA, and GLORIA  
17 RUTH LARGAESPADA, by and through their attorneys of record, RICHARD A. HARRIS and  
18 JOHNATHAN LEAVITT, of the law firm RICHARD HARRIS LAW FIRM; Defendant/Third-  
19 party Plaintiff AMAZON.COM, INC. (“Defendant Amazon.com”), by and through its attorneys  
20 of record, KAREN L. BASHOR and CHRISTOPHER D. PHIPPS, of the law firm WILSON,  
21 ELSER, MOSKOWITZ, EDELMAN & DICKER, LLP; Defendants VOKHIDZMON  
22 ABDUKARIMOV (“Defendant Abdukarimov”) and BXT, INC. (“Defendant BXT”), by and  
23 through their attorneys of record, ELIZABETH M. DEANE, of the law firm BREMER WHYTE  
24 BROWN & O’MEARA, LLP; and Defendant/Third-party Defendant INKAS, LLC, (“Defendant  
25 Inkas”) by and through its attorneys of records M. BRADLEY JOHNSON and GINA  
26 MUSHMECHE, of the law firm SCHNITZER JOHNSON & WATSON, CHTD. (collectively,  
27 “Parties”), hereby stipulate to extend the deadlines in this action as set forth in the Court’s Order  
28 [ECF No. 64]. The Parties hereby aver, under LR IA 6-1(a), that this is the second overall request

for extended deadlines, and Defendant Oxos's first overall request for extended deadlines.

**I. DISCOVERY COMPLETED TO DATE**

- Parties Ornelas Plaintiffs, BXT, and Amazon conducted a Rule 26(f) conference on July 5, 2023.
- Plaintiffs Ornelas served their initial Rule 26(a)(1) disclosures on July 18, 2022.
- Plaintiffs Largaespada served their initial Rule 26(a)(1) disclosures on September 21, 2023.
- Defendant Amazon.com served its initial Rule 26(a)(1) disclosures on April 18, 2022.
- Defendants Abdugarimov and BXT serve their initial Rule 26(a)(1) disclosures on July 20, 2022.
- Defendant Inkas served its initial Rule 26(a)(1) disclosures on December 5, 2023.
- Plaintiff Justin Ornelas propounded a full set of written discovery to Defendant Abdugarimov (Requests for Admission, Interrogatories, and Requests for Production of Documents), for which responses have been provided.
- Plaintiff Justin Ornelas, Plaintiff J.O. (minor) and Plaintiff Jasmin Ornelas have each propounded a full set of written discovery to Amazon (Requests for Admissions, Interrogatories, and Requests for Production), for which responses have been provided.
- Defendant Amazon propounded a full set of written discovery to each Plaintiff Justin Ornelas, Plaintiff J.O. (minor), and Plaintiff Jasmin Ornelas (Requests for Admissions, Interrogatories, and Requests for Production), for which responses have been provided.
- Plaintiff Irene Largaespada, Plaintiff Gloria Largaespada, Plaintiff Roger Largaespada, and Plaintiff Jose Largaespada have each propounded a full set of written discovery to Amazon (Requests for Admissions, Interrogatories, and Requests for Production), for which responses have been provided.
- Defendant Amazon propounded a full set of written discovery to Defendant BXT (Requests for Admission, Interrogatories, and Requests for Production of Documents), for which responses have been provided.

- Defendant Amazon propounded a full set of written discovery to Defendant Inkas (Requests for Admission, Interrogatories, and Requests for Production of Documents), for which responses have been provided.
- Defendant Oxos duly served a Demand for Prior Discovery under LR 26-5 on March 12, 2024.

## II. DISCOVERY TO BE COMPLETED

Discovery to be completed includes:

- Depositions of the NRCP 30(b)(6) witnesses of Defendants Amazon, Inkas, BXT, and OXOS.
- Depositions of all named Plaintiffs.
- Depositions of various lay witnesses and other fact witnesses.
- Depositions of Investigating Officers.
- Defendant Amazon.com wishes to inspect the vehicles of Plaintiffs Ornelas and Largaespada.
- Rule 35 Examinations of Plaintiffs based on the future treatment recommendations of their providers.
- Disclosure of Initial Experts.
- Disclosure of Rebuttal Experts.
- Depositions of Plaintiffs' respective treating physicians and/or retained expert witnesses.
- Depositions of Defendants' retained experts.
- Additional written and oral discovery as deemed necessary by the parties as this action proceeds.
- Subpoena of All Sets of Medical Records relevant to each respective Plaintiff's alleged injuries and damages.
- Plaintiffs Largaespada will be propounding written discovery.

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1       **III.     REASON DISCOVERY HAS NOT BEEN COMPLETED**

2           This is a complex matter involving multiple lawsuits (including a third action, *Rivera v.*  
3 *Oxos, LLC*, Case No. A-23-869867-C, filed in the Eighth Judicial District Court in and for Clark  
4 County, Nevada), multiple plaintiffs, and multiple defendants. The Parties have been diligently  
5 working to complete discovery in this matter. However, additional time is needed. Defendant  
6 OXOS was just added into this case late last year and has been in the process of getting up to  
7 speed. However, doing so requires additional time due to the complexity of this case, the number  
8 of Plaintiffs, and the various damages claims being asserted by each.

9           Furthermore, the Parties are considering global mediation with all nine plaintiffs and all  
10 four defendants, with the parties likely needed at least one day, if not several days, to address the  
11 claims of all parties who have an interest in this case. The mediators that the parties have looked  
12 into are rather booked up such that the earliest they could expect to get into mediation would  
13 likely be sometime in June 2024. The parties are currently coordinating to identify a mediator and  
14 dates for mediation prior to July 1, 2024.

15          The Parties hereby stipulate to extend the currently controlling discovery deadlines stated  
16 in this Court's Order setting deadlines [ECF No. 64] by 120 days as provided below. The Parties'  
17 work regarding discovery is actively ongoing, and it will continue in diligent fashion. The Parties  
18 have acted in good faith to request this extension, and none of them has a reason or intent to delay  
19 these proceedings or jury trial in this matter. The purpose of this stipulation to extend deadlines  
20 is to allow the recently joined Defendant to get up to speed, to allow the parties to engage in all  
21 necessary investigation and discovery prior to trial, and to allow the parties the ability to seek  
22 global resolution through mediation with enough time remaining thereafter in the event that global  
23 resolution is not possible in this case.

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1       **IV.     PRIOR SCHEDULE**

2           According to the Court's Order [ECF No. 64] setting deadlines, the existing deadlines are:

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4           Amend Pleadings / Add Parties:	April 22, 2024
5           Initial Expert Disclosures:	May 20, 2024
6           Rebuttal Expert Reports:	June 20, 2024
7           Close of Discovery:	July 19, 2024
8           Dispositive Motions:	August 19, 2024
9           Joint Pre-Trial Order:	September 18, 2024

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11       **V.     PROPOSED SCHEDULE**

12           Private Mediation:	July 1, 2024
13           Amend Pleadings / Add Parties:	August 20, 2024
14           Initial Expert Disclosures:	September 19, 2024
15           Rebuttal Expert Reports:	October 18, 2024
16           Close of Discovery:	November 16, 2024
17           Dispositive Motions:	December 17, 2024
18           Joint Pre-Trial Order:	January 16, 2025

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20           If this extension is granted, all anticipated additional discovery should be concluded within

21 the stipulated extended deadline, though experience suggests the parties may need to seek

22 additional time to finalize discovery, such as remaining expert or fact witness depositions. The

23 Parties aver that this request for extension of discovery deadlines is made by the parties in good

24 faith and not for the purpose of delay.

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1 Dated this 29<sup>th</sup> day of March 2024

2 **RESNICK & LOUIS, P.C.**

3 /s/ Matthew B. Beckstead

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10 *Attorneys for Defendant,*

11 *Oxos, LLC*

12 Dated this 29<sup>th</sup> day of March 2024

13 **WILSON, ELSER, MOSKOWITZ,**  
14 **EDELMAN & DICKER, LLP**

15 /s/ Christopher D. Phipps

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22 *Attorneys for Defendant/Third-party*  
23 *Plaintiff, Amazon.com, Inc.*

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Dated this \_\_\_\_ day of March 2024

**STOLL, NUSSBAUM & POLAKOV**

Wet-ink Signature Attached Below

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*Justin Ornelas as Guardian Ad Litem for*

*Justin Ornelas*

Dated this 29<sup>th</sup> day of March 2024

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Dated this \_\_\_\_ day of March 2024

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Oxos, LLC*

Dated this \_\_\_\_ day of March 2024

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Plaintiff, Amazon.com, Inc.*

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Dated this 29 day of March 2024

**STOLL, NUSSBAUM & POLAKOV**

*Robert Stoll*

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Dated this \_\_\_\_ day of March 2024

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BXT, Inc.*



1 Dated this 29<sup>th</sup> day of March 2024

Dated this 29<sup>th</sup> day of March 2024

2 **RICHARD HARRIS LAW FIRM**

**SCHNITZER WATSON &  
JOHNSON, CHTD.**

3 /s/ Johnathan M. Leavitt

/s/ Gina M. Mushmeche

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*Defendant,*

8 *Jose Orlando Largaespada,*

*Inkas, LLC*

*Irene Largaespada, and*

9 *Gloria Ruth Largaespada*

10  
11 **IT IS SO ORDERED.**

12   
13 UNITED STATES MAGISTRATE JUDGE

14 DATED: 4/2/2024